UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In Re: Chap

Roberto A Grau-Feria

Bankruptcy No. 24-12338-AMC

Debtor

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

- 1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
- 2. The within case was commenced by the filing of a Chapter 13 petition on 07/08/2024.
- 3. This Motion to Dismiss has been filed for the following reason(s):
 - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.

WHEREFORE, Scott F. Waterman, Esq., Standing Chapter 13 Trustee, requests that the Court, after a hearing, enter an Order dismissing this case.

Date: 11/19/2024 Respectfully submitted,

/s/ Ann Swartz, Esq.

Ann Swartz, Esq.

for

Scott F. Waterman, Esq. Standing Chapter 13 Trusteee 2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

Telephone: (610) 779-1313